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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

TERESA TURNER, INDIVIDUALLY  
AND ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

Plaintiff,

v.

NATIONAL NOTARY  
ASSOCIATION,

Defendant.

Case No. 2:25-CV-00334-FMO-PD

**FED. R. CIV. P. 5.1 NOTICE OF  
CONSTITUTIONAL CHALLENGE**

Judge: Fernando M. Olguin

Pursuant to Fed. R. Civ. P. 5.1, National Notary Association (“NNA”), through its undersigned attorneys, provides this notice of its constitutional challenge of a federal statute:

1. On March 7, 2025, the NNA filed a Fed. R. Civ. P. 12(b)(6) motion to dismiss (“Motion”) challenging the constitutionality of the Video Privacy Protection

1 Act, 18 U.S.C. § 2710 (“VPPA”). [ECF No. 14]. The Motion argues that the VPPA  
2 facially and as applied violates the First Amendment and the Due Process Clause of  
3 the Fifth Amendment of the United States Constitution. *Id.* at 22-25.

4 2. On March 17, 2025, I provided notice to the United States Attorney  
5 General by mailing a copy of the Motion by U.S. Certified Mail to:

6 Pam Bondi, Attorney General of the United States  
7 U.S. Department of Justice  
8 950 Pennsylvania Avenue, NW  
9 Washington, DC 20530-0001

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11 Dated: March 17, 2025

CLARK HILL LLP

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13 By: /s/ Myriah V. Jaworski  
14 Myriah Jaworski

15 *Attorneys for Defendant National Notary*  
16 *Association*  
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